

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

V.

MARENE TOMPKINS

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§

CRIMINAL NO. 18-40

**UNOPPOSED MOTION TO AMEND CONDITIONS OF RELEASE**

MARENE TOMPKINS, through counsel George D. Murphy, Jr., moves to amend the conditions of her release to allow her to travel to Arizona on September 7 2018, and return to Houston, Texas on September 11, 2018. In support, Mrs. Tompkins present the following.

I.

On January 24, 2018, Marene Tompkins was indicted. The indictment alleges that she participated in a healthcare fraud scheme. On February 15, 2018, Mrs. Tompkins was released on a \$10,000 unsecured bond. One condition of her release is that her travel is restricted to the Southern District of Texas.

Mrs. Tompkins's mother died on Wednesday, August 29, 2018. She would like to attend her mother's memorial service which is on Monday, September 10, 2018. While in Arizona, Mrs. Tompkins will be staying with family. She will forward her complete itinerary to her pretrial services officer

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II.

Counsel has conferred with Mr. Andrew Flores, the Tompkins pretrial services officer, and Ms. Julie Redlinger, the Assistant United States Attorney handling this case. Both are unopposed to this motion.

Respectfully submitted,

/s/ George D. Murphy, Jr.  
George D. Murphy, Jr.  
Texas State Bar No. 14697990  
1001 Fannin, Suite 2450  
Houston, Texas 77002  
(713) 658-1960

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of September, 2018, I e-filed the foregoing Unopposed Motion to Amend Conditions of Release.

/s/ George D. Murphy, Jr  
George D. Murphy, Jr.

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**ORDER**

It is hereby ORDERED that Marene Tompkins may travel to Arizona on September 7, 2018, and she must return to Houston, Texas no later than September 11, 2018.

Signed this \_\_\_\_ day of September, 2018.

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Honorable Sim Lake